

REMARKS

Applicant certainly appreciates the indication of allowance of claims 3-5, 11-13 and 15-17 if amended to become independent, incorporating the requirements of the base claims and any intervening claims. Applicant has accordingly amended claim 3 to make it independent.

Applicant submits that claim 1 is patentable, thus has not amended claims 11-13 or 15-17 to become independent. Applicant has canceled the non-elected claims 18-45 and added new claims 46-58. Claim 46 is similar to claim 1, having requirements of a buoyant hull, a tendon assembly, a counterweight, an anchor member and an engaging member at the lower end of the tendon assembly. Applicant submits that new claim 46 should not require restriction, and the remaining new claims depend from claim 46. No additional fee is due because of the canceled claims, however if any fees should be due, please charge them to Bracewell & Giuliani Deposit Account No. 50-0259.

Applicant respectfully traverses the rejection of the rejected claims over the cited art and respectfully requests reconsideration. First, briefly looking at Figure 1 of the application, claim 1 requires a tendon assembly 13, a counterweight 17 suspended above the sea floor at the lower end of tendon assembly 13, an anchor member 11 embedded in the sea floor, and an engaging member 19 at the lower end of tendon assembly 13 that telescopingly engages the upper end of anchor member 11. The use of reference numbers in this amendment is for convenience only and not in a limiting manner.

Claim 1 was rejected over Blakseth '358. Blakseth '358 discloses a riser 14 that is rigidly connected to a wellhead 16, which in turn is rigidly connected to casing 12. A pipe 20 has an upper end rigidly connected to platform 30 for movement with it and a lower end that extends into riser 14 in a telescoping relation. Heave compensators 18 apply an upward pull on riser 14, which has its lower end rigidly attached to the sea floor via wellhead 6 and casing 12.. Upward

and downward movement of platform 30 in response to waves and current causes telescoping pipe 20 to move upward and downward within the upper end of riser 14, which is above the level of the sea 16.

Claim 1 as amended requires a counterweight suspended above the sea floor at a lower end of the tendon assembly. There is no counterweight in Blakseth, rather wellhead 6 is stationarily secured to casing 12, which in turn is embedded in the earth. Wellhead 6 is not suspended above the sea floor and supported by riser 14 to apply tension to riser 14. Claim 1 also requires an engaging member at the lower end of the tendon assembly that telescopingly engages the upper end of the anchor member. There is no telescoping engagement between the lower end of riser 14 and wellhead 6, nor between wellhead 6 and casing 12. Telescoping pipe 20 is supported by the platform and telescopingly engages the upper end of riser 14. Telescoping pipe 20 is not located at the lower end of any structure that could be considered a tendon assembly.

Claim 6 depends from claim 1, requiring a plurality of internal risers, each having a separate axis. Figure 2 of the application illustrates internal risers 31 extending alongside each other inside tendon 15. In Blakseth, workover riser 4 is located concentrically within riser 14, thus riser 4 and riser 14 would have the same axis, not a separate axis.

Claim 7 further requires a plurality of flow lines coupled to well equipment on the seafloor and extending to the counterweight. In Figure 1 of the application, the flowlines are indicated by the numeral 29. There is no flowline shown in Blakseth, particularly one extending to a counterweight.

Claim 8 requires an external riser extending along the tendon assembly and connected to a subsea wellhead on the seafloor. Figure 10 of the application shows an example of a riser 99 connected to a subsea well extending alongside tendon 96. This is not suggested in Blakseth.

Claim 9 requires an anti-rotation device between the engaging member and the upper end of the anchor member. One embodiment of an anti-rotation device is shown by the rod 47 and bracket 49 in Figure 3. There is no suggestion of any type of device to prevent rotation between telescoping tube 1 and riser 14.

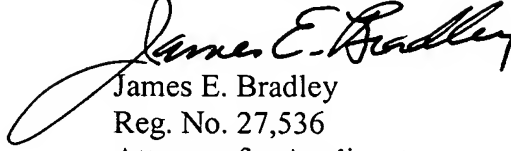
Claim 10 also requires external risers, and it requires that they engage the counterweight. In Figure 10 of the application, risers 87 engage lateral brackets 93 of counterweight 90.

Claim 14 is best illustrated in Figure 12 of the application. Claim 14 requires an upper riser section 123 that is larger in diameter than lower tendon section 121. In Blakseth, upper telescoping pipe 20 is smaller in diameter than riser 14, not larger. Claim 14 also requires an upper weight 129 secured to a lower end of the upper riser section. In Blakseth, the lower end of telescoping pipe 20 inserts into riser 14, and does not have a weight on it.

Claim 46 is similar to claim 1, requiring a counterweight at the lower end of the tendon assembly that is movable in unison with the lower end of the tendon assembly. In Blakseth, wellhead 6 is fixed to casing 12, and does not move with telescoping pipe 20. Claim 46 requires a submerged engaging member at the lower end of the tendon assembly that engages the upper end of the anchor member and moves up and down relative to the anchor member in response to movement of the hull. The lower end of telescoping pipe 20 does not engage wellhead 6, rather engages riser 14. The remaining claims are dependent upon claim 46 and similar to those discussed above.

It is respectfully submitted that the claims are now in condition for allowance and favorable action is respectfully requested.

Respectfully submitted,

A handwritten signature in black ink, reading "James E. Bradley". The signature is fluid and cursive, with a large loop at the beginning of the first name.

James E. Bradley
Reg. No. 27,536
Attorney for Applicant

Date: December 4, 2008
BRACEWELL & GIULIANI LLP
P. O. Box 61389
Houston, Texas 77208 1389
Tel.: (713) 221-3301
Fax: (713) 222-3287